

Salt Lake City, Utah 84180-1203 801-538-5340

January 28, 1993

Mr. Ron Ryan **Environmental Coordinator** SF Phosphates Ltd. Company 9401 North Highway 191 Vernal, Utah 84078-7802

Dear Mr. Ryan:

Dianne R. Nielson, Ph.D.

Division Director

Reclamation Surety Estimate, SF Phosphates Ltd. Company (SF), Vernal Phosphate Re: Operations, M/047/007, Uintah County, Utah

I have reviewed your January 12, 1993 response to the Division's draft reclamation surety estimate. I appreciate your efforts in modifying the site map to include panel designations, cross hatching, and other "user friendly" features. Please continue to include these features on future map submissions.

I have revised the surety estimate using information provided in your response and additional information generated during our telephone conversation of January 27, 1993. The revised estimate includes a section dealing with final reclamation/decommissioning of the pipeline which was not included in the previous estimate. The pipeline section in the previous estimate was omitted to reflect the completion of surface reclamation of the pipeline corridor. A copy of the revised estimate is enclosed for your review. Please note the shaded items in this revision.

A surety covering three years of future escalation is presented in your response. In the revised estimate I have calculated the surety using three years of escalation and using five years of escalation. The Board of Oil, Gas and Mining has issued a directive for sureties to be based on a five year term, however, the Division will present your three year surety proposal to the Board for approval. The Division estimates the surety amount for three years of escalation to be \$1,973,000 (see enclosure).

In order to present this matter at the February 24, 1993 Board Briefing, the Division will need to receive the Reclamation Contract and Reclamation Surety in a completed form by February 5, 1993. After the reclamation surety has been approved by the Board, the permit transfer can be finalized and the old reclamation surety can be released.

Page 2 Mr. Ron Ryan M/047/007 February 2, 1993

At our last meeting a number of questions regarding the 1985 surety estimate were raised which neither of us could answer. Since that time I have discussed those questions with a member of the Division staff who participated in the production of that surety estimate. What I learned from the discussion and further file review is presented below.

Demolition - The estimate for demolition was prepared by the mine operator. The correspondence titled IX. Bonding received by the Division on April 4, 1984 did contain a list of structures included in the estimate. The figures from the correspondence were updated to current values and used in the Division's November 1985 surety estimate.

Roads - The same correspondence mentioned above contained a description of the roads included in the 1984 estimate prepared by the operator.

Pipeline bridge - The pipeline suspension bridge was included in the list of structures to be demolished in the "IX. Bonding" correspondence, but not specifically listed in the Division's November 1985 estimate.

Pipeline- Details of final reclamation/decommissioning of the pipeline were not included in the November 1985 estimate. The pipeline reclamation included was for reclamation of the surface after the pipeline was installed.

Revised MRP - This line item in the November 1985 estimate refers to a revision in the mining and reclamation plan to account for the expansion east of Highway 191 (US 44).

If you have any questions regarding this letter, please contact me or Wayne Hedberg. If you are unable to meet the submission deadline for the February Board Briefing the next Briefing will be held on March 24, 1993. In order to present an item at the March Briefing the Division would need to receive the appropriate paperwork no later than the end of business on March 4, 1993.

Thank you for your cooperation in completing this permitting action.

Sincerely,

Anthony A. Gallegos

a. Jallege

Reclamation Engineer

RECLAMATION SURETY ESTIMATE

file M47-07A.WQ1

S.F. Phosphates Ltd. Company

M/047/007

Vernal Phosphate Operations

Uintah County, Utah

Prepared by Utah Division of Oil, Gas & Mining

Last Update

01/27/93

- -This estimate is based on the Division's draft estimate of 11/6/92
- -and the surety information received from SF Phosphates dated 1/12/93
- -Shading indicate changes made since the last version
- -The Division's Nov. 1985 estimate is also referred to

Panel B

| -Current mining disturbance (1992); see map dated 1/7/93 | | | | | | | |
|--|-----|----------|----------|--------|--------|--|--|
| 19 acres | 3 | | DAYS>acr | \$/HR | \$ | | |
| supervisor days | | | 12.7 | 34.26 | 3,472 | | |
| contouring D-9 @ | 1.5 | acre/day | 12.7 | 210.44 | 21,325 | | |
| topsoil 633-D @ | 4 | acre/day | 4.8 | 225.30 | 8,561 | | |
| seed & fert. D-4@ | 10 | acre/day | 1.9 | 69.79 | 1,061 | | |
| seed @ \$185/acre | | > | 19 | 185.00 | 3,515 | | |
| fertilizer @ 50 lb/acre | | > | 19 | 45.00 | 855 | | |
| Total | | | | | 38,788 | | |

\$2,041 per acre

Panel C

| -Mining disturbance; see ma | • | ed 1/7/93 | * | | |
|-----------------------------|-----|-----------|----------|--------|--------|
| 17 acres | | | DAYS>acr | \$/HR | \$ |
| supervisor days | | | 11.3 | 34.26 | 3,106 |
| contouring D-9 @ | 1.5 | acre/day | 11.3 | 210.44 | 19,080 |
| topsoil 633-D @ | 4 | acre/day | 4.3 | 225.30 | 7,660 |
| seed & fert. D-4 @ | 10 | acre/day | 1.7 | 69.79 | 949 |
| seed @ \$185/acre | | > | 17 | 185.00 | 3,145 |
| fertilizer @ 50 lb/acre | | > | 17 | 45.00 | 765 |
| Total | | | | | 34,705 |

'\$2,041 per acre

Panel C-MISC.

-Unreclaimed areas in Panel C which provide access & will remain disturbed

-until final reclamation. Does not include SAG Mill & Mine Shop

| 101 acres | | | DAYS>acr | \$/HR | \$ |
|-----------------|---|----------|----------|--------|--------|
| supervisor days | | | 33.7 | 34.26 | 9,227 |
| ripping D-9 @ | 3 | acre/day | 33.7 | 210.44 | 56,679 |

| seed @ \$185/acre | | > | 180 | 185.00 | 33,300 |
|-------------------------|----|----------|----------|--------|---------|
| fertilizer @ 50 lb/acre | | > | 180 | 45.00 | 8,100 |
| Total | | | | | 367,470 |
| | | \$2,041 | per acre | • | |
| | | | | | • |
| SAG Mill & Shop | | _ | | | |
| fertilizer @ 50 lb/acre | | | | | |
| 21.2 acres | | | DAYS>acr | \$/HR | \$ |
| supervisor days | | | 5.3 | 34.26 | 1,453 |
| topsoil 633-D @ | 4 | acre/day | 5.3 | 225.30 | 9,553 |
| seed & fert. D-4 @ | 10 | acre/day | 2.1 | 69.79 | 1,184 |
| seed @ \$185/acre | | > | 21 | 185.00 | 3,922 |
| fertilizer @ 50 lb/acre | | > | 21 | 45.00 | 954 |
| Total | | | | - | 17,065 |

Main Office & Mill

-Earthwork in the Main Office & Mill area after final reclamation demolition

-Demolition of facilities is included in the Demolition section

| 24 acres | | | DAYS>acr | \$/HR | \$ |
|-------------------------|----|----------|----------|---------------|--------|
| supervisor days | | | 8.0 | 34.26 | 2,193 |
| ripping D-9 @ | 3 | acre/day | 8.0 | 210.44 | 13,468 |
| seed & fert. D-4 @ | 10 | acre/day | 2.4 | 69.79 | 1,340 |
| seed @ \$185/acre | , | > | 24 | 185.00 | 4,440 |
| fertilizer @ 50 lb/acre | | > | 24 | 45.00 | 1,080 |
| Total | | | | - | 22,521 |

\$938 per acre

\$805 per acre

Unpaved Roads

-Unpaved access roads throughout the mine site; estimated 10 mi x 15 ft

-These roads are not indicated on the 1/7/93 map

| 18 acres | ; | | DAYS>acr | \$/HR | \$ |
|-------------------------|----|----------|----------|--------|--------|
| supervisor days | | | 3.6 | 34.26 | 987 |
| ripping D-9 @ | 5 | acre/day | 3.6 | 210.44 | 6,061 |
| seed & fert. D-4 @ | 10 | acre/day | 1.8 | 69.79 | 1,005 |
| seed @ \$185/acre | | > | 18 | 185.00 | 3,330 |
| fertilizer @ 50 lb/acre | | > | 18 | 45.00 | 810 |
| Total | | | | - | 12,192 |

\$677 per acre

| seed & fert. D-4@ | 10 acre/day | 10.1 | 69.79 | 5,639 |
|-------------------------|-------------|------|--------|--------|
| seed @ \$185/acre | > | 101 | 185.00 | 18,685 |
| fertilizer @ 50 lb/acre | > | 101 | 45.00 | 4,545 |
| Total | | | | 94,775 |
| | * | | | |

\$938 per acre

Panel D

-See acreage in panel D listed as reclaimed in 1992 on 1/7/93 map

-SF was not able to fully reclaim all these areas in '92, => \sim 1/2 total area

| 55 acres | 3 | | DAYS>acr | \$/HR | \$ |
|-------------------------|-----|-----------|----------|--------|--------|
| 5 supervisor days | | | 5.0 | 34.26 | 1,370 |
| 5 acre contouring D-9 | 1.5 | acre/clay | 3.3 | 210.44 | 5,612 |
| 5 acre topsoil 633-D | 4 | acre/day | 1.3 | 225.30 | 2,253 |
| seed & fert. D-4@ | 10 | acre/day | 5.5 | 69.79 | 3,071 |
| seed @ \$185/acre | | > | 55 | 185.00 | 10,175 |
| fertilizer @ 50 lb/acre | | > | 55 | 45.00 | 2,475 |
| Total | | | | | 24,956 |

\$454 per acre

Panel D-MISC.

-Access to Panel D mining areas to remain until time

-of final reclamation; see map 1/7/93

| 25 acre | es | | DAYS>acr | \$/HR | \$ |
|-------------------------|----|----------|----------|--------|--------|
| supervisor days | | | 8.3 | 34.26 | 2,284 |
| ripping D-9 @ | 3 | acre/day | 8.3 | 210.44 | 14,029 |
| topsoil 633-D @ | 4 | acre/day | 6.3 | 225.30 | 11,265 |
| seed & fert. D-4 @ | 10 | acre/day | 2.5 | 69.79 | 1,396 |
| seed @ \$185/acre | | > | 25 | 185.00 | 4,625 |
| fertilizer @ 50 lb/acre | | > | 25 | 45.00 | 1,125 |
| Total | | | | · | 34.724 |

\$1,389 per acre

FUTURE MINING

-The projected disturbance for 3 years of future mining in Panels C & D -at 60 acres/year of new disturbance; areas are not shown on 1/7/93 map

| * | | | , ., . = | | | |
|---|--------------------|-----|----------|----------|--------|---------|
| | 180 acres | | | DAYS>acr | \$/HR | \$ |
| | supervisor days | | | 120.0 | 34.26 | 32,890 |
| | contouring D-9 @ | 1.5 | acre/day | 120.0 | 210.44 | 202,022 |
| | topsoil 633-D @ | 4 | acre/day | 45.0 | 225.30 | 81,108 |
| | seed & fert. D-4 @ | 10 | acre/day | 18.0 | 69.79 | 10,050 |

| seed @ \$185/acre | | > | 180 | 185.00 | 33,300 |
|-----------------------------|------|-----------------|----------|--------|---------|
| fertilizer @ 50 lb/acre | | > | 180 | 45.00 | 8,100 |
| Total | | | | | 367,470 |
| | | \$2,041 | per acre | _ | |
| SAG Mill & Shop | | | | | |
| -SAG Mill (15 acres) & Mine | Shop | - (6.2 acres |) | | |
| 21.2 acres | 3 | | DAYS>acr | \$/HR | \$ |
| supervisor days | | | 5.3 | 34.26 | 1,453 |
| topsoil 633-D @ | 4 | acre/day | 5.3 | 225.30 | 9,553 |
| seed & fert. D-4 @ | 10 | acre/day | 2.1 | 69.79 | 1,184 |
| seed @ \$185/acre | | > | 21 | 185.00 | 3,922 |
| fertilizer @ 50 lb/acre | | > | 21 | 45.00 | 954 |
| Total | | | | _ | 17,065 |
| | | \$805 | per acre | | |

Main Office & Mill

-Earthwork in the Main Office & Mill area after final reclamation demolition

-Demolition of facilities is included in the Demolition section

| 24 acres | | | DAYS>acr | \$/HR | \$ |
|-------------------------|----|----------|----------|--------|--------|
| supervisor days | | | 8.0 | 34.26 | 2,193 |
| ripping D-9 @ | 3 | acre/day | 8.0 | 210.44 | 13,468 |
| seed & fert. D-4 @ | 10 | acre/day | 2.4 | 69.79 | 1,340 |
| seed @ \$185/acre | | > | 24 | 185.00 | 4,440 |
| fertilizer @ 50 lb/acre | | > | 24 | 45.00 | 1,080 |
| Total | | | | _ | 22,521 |

\$938 per acre

Unpaved Roads

-Unpaved access roads throughout the mine site; estimated 10 mi x 15 ft

-These roads are not indicated on the 1/7/93 map

| 18 acres | | | DAYS>acr | \$/HR | \$ |
|-------------------------|----|----------|----------|--------|--------|
| supervisor days | | | 3.6 | 34.26 | 987 |
| ripping D-9 @ | 5 | acre/day | 3.6 | 210.44 | 6,061 |
| seed & fert. D-4 @ | 10 | acre/day | 1.8 | 69.79 | 1,005 |
| seed @ \$185/acre | | > | 18 | 185.00 | 3,330 |
| fertilizer @ 50 lb/acre | | > | 18 | 45.00 | 810 |
| Total | | | | | 12,192 |

\$677 per acre

Paved Roads

-Paved access roads to & from the main offices; estimated at 2.9 mi x 30 ft

-These roads are not clearly indicated on the 1/7/93 map

| | acres | DAYS>acr | \$/HR | \$ |
|-------------------------|--------------------------|----------|-------------|--------|
| supervisor days | | 3.7 | 34.26 | 1,005 |
| contouring D-9 @ | 5 acre/day | 2.2 | 210.44 | 3,704 |
| ripping D-9 @ | 5 acre/day 3 acre/day | 3.7 | 210.44 | 6,173 |
| seed & fert. D-4 @ | 10 acre/day | 1.1 | 69.79 | 614 |
| seed @ \$185/acre | > | 11 | 185.00 | 2,035 |
| fertilizer @ 50 lb/acre | > | 11 | 45.00 | 495 |
| Total | | | | 14,026 |

\$1,275 per acre

Tailings Pond-Misc

| -Miscellaneous areas associated | with t | the tailings | dam not | shown on | 1/7/93 map |
|---------------------------------|--------|--------------|---------|----------|------------|
| | | | | | |

| | | | 5 | | | |
|-------------------------|----|----------|----------|--------|--------|--|
| 43 acres | 3 | • | DAYS>acr | \$/HR | \$ | |
| supervisor days | | | 14.3 | 34.26 | 3,928 | |
| ripping D-9 @ | 3 | acre/day | 14.3 | 210.44 | 24,130 | |
| topsoil 633-D @ | 4 | acre/day | 10.8 | 225.30 | 19,376 | |
| seed & fert. D-4@ | 10 | acre/day | 4.3 | 69.79 | 2,401 | |
| seed @ \$185/acre | | > | 43 | 185.00 | 7,955 | |
| fertilizer @ 50 lb/acre | | > | 43 | 45.00 | 1,935 | |
| Total | | | | | 59,726 | |

\$1,389 per acre

Tailings Pond-Impounded Material

| 345 acre | s | _ | DAYS>acr | \$/HR | \$ |
|-------------------------|----|----------|----------|--------|---------|
| supervisor days | | | 34.5 | 34.26 | 9,456 |
| discing D-4 @ | 10 | acre/day | 34.5 | 69.79 | 19,262 |
| seed & fert. D-4 @ | 10 | acre/day | 34.5 | 69.79 | 19,262 |
| mulcher @ | 24 | acre/day | 14.4 | 280.00 | 32,200 |
| seed @ \$185/acre | | > | 345 | 185.00 | 63,825 |
| fertilizer @ 50 lb/acre | | > | 345 | 45.00 | 15,525 |
| mulch @ 1 ton/acre | | . > | 345 | 100.00 | 34,500 |
| Total | | | | | 194,030 |

\$562 per acre

Roads OMIT-This item included in Paved & Unpaved Roads Sections

Pipeline

-An estimate of the maximum area re-disturbed due to decommissioning or

-repair of the pipeline at final reclamation

| 2.5 | acres | DAYS>acr | \$/HR | \$ |
|-------------------------|-------------|----------|--------|-------|
| supervisor for | | 0.5 | 34.26 | 137 |
| contouring D-9 @ | 5 acre/day | 0.5 | 210.44 | 842 |
| seed & fert. D-4 @ | 10 acre/day | 0.3 | 69.79 | 140 |
| seed @ \$185/acre | > | 2.5 | 185.00 | 463 |
| fertilizer @ 50 lb/acre | > | 2.5 | 45.00 | 113 |
| Total | | | | 1,693 |

\$677 per acre

Conveyor w/tunnel

OMIT-this item included in Panel C Misc. Section

Access roads D&E

OMIT-This item included in Unpaved Roads Section

Demolition costs (IX BONDING)

-This section was amended to the plan in January 1984

-Man or equipment days used here were taken from the Nov. 1985 estimate

| | DAYS | \$/HR | \$ |
|------------------|-------|--------|---------|
| supervisors | 140.0 | 34.26 | 38,371 |
| laborers | 851.0 | 27.86 | 189,671 |
| welders | 150.0 | 39.85 | 47,820 |
| crane & operator | 75.8 | 185.20 | 112,231 |
| D-7 dozer | 10.5 | 136.99 | 11,507 |
| tractor trailer | 151.5 | 111.25 | 134,835 |
| front end loader | 86.0 | 73.10 | 50,293 |
| Total | | | 584,728 |

Revised MRP August 1984

-This revision was dated August 10, 1984

-The revision was for expansion of mining operations east of Highway 191 (US 44)

-Man or equipment days used here were taken from the Nov. 1985 estimate

| | DAYS | \$/HR | \$ |
|------------------|-------|--------|--------|
| supervisors | 84.0 | 34.26 | 23,023 |
| laborers | 425.0 | 27.86 | 94,724 |
| welders | 40.0 | 39.85 | 12,752 |
| crane & operator | 25.0 | 185.20 | 37,040 |
| D-7 dozer | 4.0 | 136.99 | 4,384 |
| D-9 dozer | 5.0 | 210.44 | 8,418 |
| tractor trailer | 30.0 | 111.25 | 26,700 |

front end loader Total

22.0

73.10

12,866 219,906

Additional mine areas

OMIT-This item included in Future Mining Section

| BONDING SUMMARY | | ACRE | \$ | \$/acre |
|------------------------------|-------------------|-------|-----------|-------------|
| Panel B | | 19 | 38,788 | 2,041 |
| Panel C | | 17 | 34,705 | 2,041 |
| Panel C-Miscellaneous | | 101 | 94,775 | 938 |
| Panel D | | 55 | 24,956 | |
| Panel D-Miscellaneous | | 25 | 34,724 | 1,389 |
| Future Mining | | 180 | 367,470 | 2,041 |
| SAG Mill & Shop | | 21.2 | 17,065 | 805 |
| Plant Facilities | | 24 | 22,521 | 938 |
| Unpaved Roads | | 18 | 12,192 | 677 |
| Paved Roads | | 11 | 14,026 | 1,275 |
| Tailings Pond - Miscellaneou | s Areas | 43 | 59,726 | 1,389 |
| Tailings Pond - Impounded M | 1aterial | 345 | 194,030 | 562 |
| Pipeline | | 2.5 | 1,693 | 677 |
| Demolition (IX Bonding) | N/A | 4 | 584,728 | N/A |
| Revised MRP Aug. 1984 | N/A | 4 | 219,906 | N/A |
| Marin | SUBTOTAL | | 1,721,305 | |
| Mobilization | | | 6,000 | |
| | SUBTOTAL | | 1,727,305 | |
| ADD 10% Contingency | | | 172,731 | |
| FOOM ATION TO | SUBTOTAL | | 1,900,036 | |
| ESCALATION FOR 3 YRS @ | | | | 73,315 |
| | IN 1996-\$ | | | \$1,973,350 |
| | DED TOTAL IN 1996 | 6-\$ | | \$1,973,000 |
| AVG. C | COST/ACRE = \$ | 2,290 | | |
| ESCALATION FOR 5 YEARS (| @ 1.27%/YR | | 123,756 | |
| 107 (4) | IN 1008 ¢ | | 120,700 | / |

TOTAL IN 1998-\$

\$2,023,792

ROUNDED TOTAL IN 1998-\$

\$2,024,000

TOTAL ACREAGE BONDED =

DIFFERENCE

AVG. COST/ACRE =

\$2,349

\$51,000